

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	CR. NO. 05-10106-DPW
	)	
MICHAEL O'DONNELL	)	
	)	

**GOVERNMENT'S ASSENTED-TO MOTION TO CONTINUE**  
**PLEA HEARING**

The United States of America, by and through its attorneys, United States Attorney Michael J. Sullivan, and Assistant U.S. Attorney Donald L. Cabell, hereby moves that the Court continue the plea hearing in this case, presently scheduled for September 27, 2005, to another date in mid to late October. In support of the motion, the government states that the defendant was arrested on September 16, 2005 on a federal arrest warrant issued in connection with the defendant's alleged violation of certain conditions of supervised release on a prior conviction, in the matter of United States v. Michael O'Donnell, 98-CR-10014-REK. Counsel for the defendant in the present case was not counsel in the prior matter, and thus requires additional time to discuss this recent development with the defendant and his counsel in the prior case, as well as the effect, if any, of this development on the defendant's intention to plead to the Information. Accordingly, the defendant assents to the motion to continue.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By:

/s/Donald L. Cabell  
DONALD L. CABELL  
Assistant U.S. Attorney